

PATRICK L. FORTE, #80050
CORRINE BIELEJESKI, #244599
LAW OFFICES OF PATRICK L. FORTE
One Kaiser Plaza, #480
Oakland, CA 94612
Telephone: (510) 465-3328
Facsimile: (510) 763-8354

Attorneys for Debtors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

Case No. 09-40380 RN

**MATTHEW EDWIN DORRICOTT and
ALLISON ELLEN DORRICOTT,**

Chapter 13

Debtors.

**MOTION TO MODIFY CHAPTER 13 PLAN;
NOTICE TO CREDITORS OF
DEADLINE TO REQUEST A HEARING**

The above-named debtors apply to the court for an order to modify their Chapter 13 Plan as follows:

Commencing February 2011, debtors will pay \$100.00 per month to the Trustee. Any arrearages shall be forgiven. Unsecured, non-priority creditors shall be paid on a pro-tanto basis.

Debtors shall surrender the real property located at 1093 W. Cypress Road, Oakley, CA 94561 to JPMorgan Chase Bank, Wells Fargo, & Contra Costa County Tax Collector.

The modification is sought on the following grounds:
Debtors' income has decreased. Debtors cannot afford to keep the real property.

NOTICE IS HEREBY GIVEN:

1 (i) That Local Rule 9014-1 of the United States Bankruptcy Court
2 for the Northern District of California prescribes the procedures to be
3 followed and that any objection to the requested relief, or a request for
4 hearing on the matter must be filed and served upon the undersigned
5 within twenty one (21) days of mailing of this notice;

6 (ii) That a request for hearing or objection must be accompanied
7 by any declarations or memoranda of law the party objecting or requesting
8 wishes to present in support of its position;

9 (iii) That if there is not a timely objection to the requested
10 relief or a request for hearing, the Court may enter an order granting
11 the relief by default; and

12 (iv) That the undersigned will give at least seven (7) days written
13 notice of hearing to the objecting or requesting party, and to any
14 trustee or committee appointed in the case, in the event an objection or
15 request for hearing is timely made.

16 Dated: January 20, 2011

17 /s/ Corrine Bielejeski
18 CORRINE BIELEJESKI
19 Attorney for Debtors
20
21
22
23
24
25
26